REMARKS/ARGUMENTS

Please reconsider the application in view of the following remarks. Claims 1-29 remain in this application.

Rejections in the Specification

The Applicant has amended paragraphs [0036] and the Abstract to address informalities cited by the Examiner. The Applicant has amended paragraphs [0063], [0071] and [0087] of the specification to conform with the drawings in the application. No new matter has been added as a result of these amendments

Rejections in the Drawings

Applicants did not amend any of the drawings in this application.

Rejection(s) under 35 U.S.C § 112

Claims 10 is rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 10 recites the limitation 'the first router" in lines 1-2. There is insufficient antecedent basis for this limitation in the claim.

Applicants have amended claims 1, 12 and 21 to further clarify and distinguish the claims.

Rejection(s) under 35 U.S.C § 102

Claims 1-6, 12-16, 21-24 and 29 are rejected under 35 U.S.C. 102(b) as being anticipated by Isfeld et al. (U.S.P.N. 5,802,278).

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Claims 7, 17 and 28 are rejected under 35 U.S.C. 103(a) as being unpatentable over Isbeld et al in view of Kamper (USPN 6,654,797).

Claims 8, 9, 11, 18-20 and 25-27 are rejected under 35 U.S.C. 103 (a) as being unpatentable over Isfeld et al. in view of Isfeld et al (USPN 5,483,640).

With regard the rejection of claims 1-6, 12-16, 21-24 and 29 are rejected under 35 U.S.C. 102(b) as being anticipated by Isfeld et al. (U.S.P.N. 5,802,278), Applicants respectfully traverse the Examiner's assertions. Per claim 1, the Examiner asserts that Isfeld teaches a system for managing communication on a network comprising each element described in claim 1 of the present invention.

Isfeld describes a high performance, scalable networking bridge/router system. The bridge/router architecture according to the present invention is based on a message passing system, which interconnects a plurality of input/output modules. The input/output modules vary in complexity from a simple network interface device having no switching or routing resources on board, to a fully functional bridge/router system. Also, in between these two extremes input/output modules which support distributed protocol processing with differing levels of intelligence are included. This invention addresses the problem of bridge/router scalability. In other words, Isfeld addresses problems of configuring a router with adequate size for a particular system without having an excessive size router to ensure that the router size will be adequate for the application.

The present invention provides for easily configuring and re-configuring the router to accommodate the variations in parameters for changing from one network interface device to another. In one aspect, the router has a configuration file for performing an initial, automatic configuration when the router is booted. The host has a processor and a storage unit with a

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software program stored thereon. The configuring of the router by the bootable configuration file enables the router to communicate with the host program so that a user can select a network connection type using an interface of the program on the host, and the program can then further automatically configure the router with parameters for the selected connection type. The Isfeld system dealt with the issue of size or scalability. The present invention addresses the issue of network component compatibility.

Referring again to claim 1, the Examiner asserts that the template file of the present invention is described at cited locations in Isbeld. The template file of the present invention contains sets of instructions that are used to reconfigure the router for a specified interface. Isbeld does contain sets of instructions. However, as stated at Col. 11 line 13, the command lists are word entities through which software instructs hardware to perform certain data transfers generally across a bus. This function is different from the router reconfiguration instructions of the present invention. In addition, the manager program of the present invention implements the instructions in the template to perform the router reconfigurations as needed. As mentioned in Isbeld on Col. 7 line 55, the software in Isbeld has two main functions: data forwarding functions and control/management functions. These functions do not address the router reconfiguration objectives contemplated in the present invention. Looking at the table in col. 26, the instructions cover data manipulation commands (xmit, read, write and move). In addition, the instructions described in Col. 43 describe the transmission of data packets. These commends do not address issues of router configuration.

Referring to claim 21, the Examiner asserts that Isbeld teaches a computer program product in a computer readable media for use in a data processing system for managing communication on a network. Again, the sections of Isbeld cited by the Examiner do not

describe the configuration module instructions as asserted by the Examiner. Isbeld's focus is on router size and provides switching techniques for transmitting data properly through a router that has the ability to change sizes.

The remainder of the rejections under 35 U.S.C. 102(b) do not identify any discussion in any of the cited references that mention reconfiguring of the network router as described in the present invention. Further, an extensive examination of the references in support of rejections under 35 U.S.C. 103(a), do not mention or discuss the reconfiguration features and techniques of the present invention. None of the references separately or in combination teach, mention or discuss reconfiguring the network router such that the router is compatible with a variety of connections for network interface devices as is described in the present invention.

In addition, the assertion of prior art in Applicant's specification is totally without merit. A full reading of the cited locations in the specification reveals the actual meaning of the term 'sand' within the context of the present application.

In summary, Isbeld (USPN 5,802,278) describes a system in which a bridge/router can be modified to various sizes to accommodate the demands of communication networks. This invention describes techniques and architectures that address the issues of router scalability. The present invention network interfaces devices are provided for a variety of connections to a WAN but only one router that is connected directly to a LAN. The router has the ability to be reconfigured to be compatible with various network interfaces.

The Examiner rejects claims 7, 17 and under 35 U.S.C. 103(a) as being unpatentable over Isfeld in view of Kamper (USPN 6,654,797). Kamper describes an apparatus and method for server configuration using a removable storage device are provided. The apparatus and methods include coupling a removable storage device reader to a server and inserting a removable storage

device into the reader. The removable storage device includes configuration data that is used to configure the server. Although there may some reconfiguring of a device, the server is not the same as the router. The server is not the portable device in Kamper. The portable device is the removable storage device. In the present application, the router is the portable device. As previously mentioned, Isbeld addresses the ability to modify the size of a router based on the environment in which the router is used. The present invention addresses the ability to reconfigure a router such that the router is compatible with any one of a plurality of network connection formats. Isbeld does not teach or suggest the configuration of a router in accordance with the description in Kamper.

The Examiner rejects claims 8, 9 11, 18-20 and 25-27 under 35 U.S.C. 103(a) as being unpatentable over Isfeld in view of Isbeld (USPN 5,483,640). Isbeld (5,483,640) describes an apparatus that includes a configuration interface, coupled with a plurality of input/output devices and the processor, through which the processor supplies configuration information to the plurality of input/output devices. The configuration interface uses a write buffer to decouple processor accesses to the plurality of input/output devices from contention with I/O data transfers. However, the configuration information is for the input/output devices and not the connection device such as a router. In the present application the configuration information is for the router device and not the input/output devices. Again, Isbeld (5,802,278) does not teach, discuss or mention any reconfiguration of a device. The modification of the router is device is a size modification. A combination of the two Isbeld references does not produce the invention described in the present application.

For the above described reasons, Applicants submit that the Examiner has failed to supply references that support the rejections stated under 35 U.S.C. 102(b) or 35 U.S.C.103(a).

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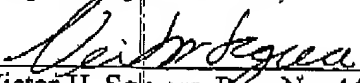Reply to Office Action Dated 08/23/2004

Applicant, therefore, respectfully requests withdrawal of the rejection of the pending Claims.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Applicant believes this reply to be fully responsive to all outstanding issues and place this

application in condition for allowance. If this belief is incorrect, or other issues arise, do not

hesitate to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: _23 - NOV - 04_

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